



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

March 25, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Imagineering Enterprises, Inc. / F141-18648-00090

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Indianapolis, Indiana 46206-6015

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www.IN.gov/idem

March 25, 2004

Ms. Nancy Norton
Imagineering Enterprises, Inc.
1302 West Sample Street
South Bend, IN 46619-3895

Re: **141-18648**
Second Administrative Amendment to
FESOP 141-14152-00090

Dear Ms. Norton:

Imagineering Enterprises, Inc. was issued a permit on November 18, 2002, for a stationary metal automotive and general commercial transportation finishing and coating source. A First Administrative Amendment (141-16781) was issued on November 27, 2002, and a First Significant Permit Revision (141-17211) was issued on April 2, 2003. A letter requesting a change was received on March 10, 2004. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

The application was for the addition of the following:

One (1) spray paint booth, identified as K-7, equipped with high volume, low pressure (HVL) spray guns and dry filters for overspray control, exhausting to wall vent AB, capacity: 200 metal parts per day.

Pursuant to 326 IAC 2-8-10(a)(14), this change requires an administrative amendment because it incorporates a modification that adds an emissions unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, and does not result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3. In addition, the unrestricted potential PM and PM₁₀ emissions are less than five (5) tons per year and the potential VOC emissions are less than ten (10) tons per year (see pages 1 and 2 of Appendix A of this document for detailed emissions calculations). Therefore, the new emissions unit does not require a Minor Permit Revision pursuant to 326 IAC 2-8-11.1. The electric drying oven, K-8, and ozone generator also being added to this source are trivial activities pursuant to 326 IAC 2-7-1(40), and do not need to be added to the permit. Changes to the permit are as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) paint booths, identified as K-1 and K-2, constructed in 1977 and 1978, respectively, equipped with air atomization spray applicators and dry filters for overspray control, exhausted through Ducts G and F, capacity: 27.0 pounds of coatings per hour, total.
- (b) One (1) centrifuge dip and spin dry film coating machine, also referred to as bulk dip and spin

parts coater, identified as L-2, constructed in January 1997 and exhausted through Ducts J and E, capacity: 5 gallons.

- (c) One (1) Passivation Line, also described as Conversion Coating Line #3, exhausting through Stacks B and V, consisting of the following:
 - (1) Seven (7) passivation tanks, identified as C-17 through C-23, capacity: 43 gallons, each;
 - (2) One (1) cold cleaner immersion tank, identified as C-24, constructed prior to February 1993, using Isopropyl Alcohol, capacity: 8 gallons;
 - (3) Two (2) passivation tanks, identified as C-27 and C-28, capacity: 34 gallons, each;
 - (4) One (1) cold cleaner tank, identified as C-29, constructed in 2000, operating in series with C-24, using isopropyl alcohol, capacity: 8 gallons.
- (d) Conversion Coating Line #1, which is a phosphate coating line and a manual etch line, identified as C-12, C-13, C-14, C-15 and C-16, exhausted through Stack W.
- (e) Conversion Coating Line #2, which is a phosphate coating line, identified as C-2 through C-8 and C-25 exhausted through Ducts T and U.
- (f) Conversion Coating Line #4, which is a phosphate coating line, identified as F-1 through F-9, exhausted through Stack A.
- (g) Plating Line #1, for electroless nickel plating, identified as prep tanks E-1 through E-8, E-21, and F-10, with E-1 exhausted through Stack A, plating tanks E-2 through E-8 exhausted through Stack D, and E-21 and F-10 exhausted through Stacks Z and AA.
- (h) Plating Line #2, for electroless nickel plating, identified as E-9 through E-13, E-15 through E-20, E-22 through E-27, E-30 and E-31, exhausted through Stack C.
- (i) One (1) non-destructive testing area, consisting of eight (8) penetrant tanks, identified as J-1 through J-7 and J-14, one (1) ZL-4C penetrant tank, identified as J-11, and one (1) nitric-hydrofluoric tank, identified as J-13.
- (j) Six (6) portable cold cleaner degreasers, identified as I-3 through I-8, constructed prior to March 1993, using methyl ethyl ketone (MEK), capacity: less than 13 gallons, each.
- (k) One (1) immersion solvent cleaning tank, identified as I-13, constructed in 2001, using methyl ethyl ketone (MEK), capacity: 8 gallons.
- (l) One (1) portable immersion cold cleaner tank, identified as I-14, constructed in 2000, using isopropyl alcohol, capacity: 6 gallons.
- (m) Four (4) blaster booths, two (2) using aluminum oxide, one (1) using glass, vermiculite or an equivalent media, and one (1) using glass, plastic, aluminum oxide or an equivalent media, and one (1) tumble blaster, using aluminum oxide beads, collectively identified as J-9, one (1) of the blaster booths is a wet blaster and the others are equipped with small baghouse dust collectors exhausting into the room; all of the blaster booths are equipped with a common baghouse dust collector exhausted through Vent H, maximum capacity: 400 pounds of parts and 0.7 pounds of blasting media per hour, total.
- (n) One paint booth, identified as K-6, equipped with electrostatic airless guns, including dry filters

for overspray control, exhausted thru Duct E.

- (o) **One (1) spray paint booth, identified as K-7, equipped with high volume, low pressure (HVLN) spray guns and dry filters for overspray control, exhausting to wall vent AB, capacity: 200 metal parts per day.**

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Coating and cleaning operations

- (a) Two (2) paint booths, identified as K-1 and K-2, constructed in 1977 and 1978, respectively, equipped with air atomization spray applicators and dry filters for overspray control, exhausted through Ducts G and F, capacity: 27.0 pounds of coatings per hour, total.
- (b) One (1) centrifuge dip and spin dry film coating machine, also referred to as bulk dip and spin parts coater, identified as L-2, constructed in January 1997 and exhausted through Ducts J and E, capacity: 5 gallons.
- (c) One (1) Passivation Line, also described as Conversion Coating Line #3, exhausting through Stacks B and V, consisting of the following:
 - (1) Seven (7) passivation tanks, identified as C-17 through C-23, capacity: 43 gallons, each;
 - (2) One (1) cold cleaner immersion tank, identified as C-24, constructed prior to February 1993, using Isopropyl Alcohol, capacity: 8 gallons;
 - (3) Two (2) passivation tanks, identified as C-27 and C-28, capacity: 34 gallons, each;
 - (4) One (1) cold cleaner tank, identified as C-29, constructed in 2000, operating in series with C-24, using isopropyl alcohol, capacity: 8 gallons.
- (d) Conversion Coating Line #1, which is a phosphate coating line and a manual etch line, identified as C-12, C-13, C-14, C-15 and C-16, exhausted through Stack W.
- (e) Conversion Coating Line #2, which is a phosphate coating line, identified as C-2 through C-8 and C-25 exhausted through Ducts T and U.
- (f) Conversion Coating Line #4, which is a phosphate coating line, identified as F-1 through F-9, exhausted through Stack A.
- (g) Plating Line #1, for electroless nickel plating, identified as prep tanks E-1 through E-8, E-21, and F-10, with E-1 exhausted through Stack A, plating tanks E-2 through E-8 exhausted through Stack D, and E-21 and F-10 exhausted through Stacks Z and AA.
- (h) Plating Line #2, for electroless nickel plating, identified as E-9 through E-13, E-15 through E-20, E-22 through E-27, E-30 and E-31, exhausted through Stack C.
- (i) One (1) non-destructive testing area, consisting of eight (8) penetrant tanks, identified as J-1 through J-7 and J-14, one (1) ZL-4C penetrant tank, identified as J-11, and one (1) nitric-hydrofluoric tank, identified as J-13.
- (j) Six (6) portable cold cleaner degreasers, identified as I-3 through I-8, constructed prior to March 1993, using methyl ethyl ketone (MEK), capacity: less than 13 gallons, each.
- (k) One (1) immersion solvent cleaning tank, identified as I-13, constructed in 2001, using methyl ethyl ketone (MEK), capacity: 8 gallons.
- (l) One (1) portable immersion cold cleaner tank, identified as I-14, constructed in 2000, using isopropyl alcohol, capacity: 6 gallons.
- (o) One (1) spray paint booth, identified as K-7, equipped with high volume, low pressure (HVLP) spray guns and dry filters for overspray control, exhausting to wall vent AB, capacity: 200 metal parts per day.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 8-6-2(a)] [326 IAC 8-1-1] [326 IAC 8-2]

- (a) The amount of VOC delivered to the applicators at the total of the ~~three (3)~~ **four (4)** paint booths (K-1, K-2, ~~and K-6~~ **and K-7**) and the VOC used at the one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14), and three (3) insignificant oil tanks (J-12, C-9 and C-26) shall be limited to less than 98.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit VOC from the entire source to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply. Compliance with this limit will also satisfy the requirements of 326 IAC 8-6, Organic Solvent Emission Limitations.
- (b) The VOC delivered to the applicators at the ~~two (2)~~ **three (3)** paint booths, identified as K-1, ~~and K-2, and K-7,~~ shall be limited to less than 15 pounds per day for each booth. Therefore, pursuant to 326 IAC 8-1-1, the requirements of 326 IAC 8-2 are not applicable.
- (c) The VOC used at the one (1) centrifuge dip and spin dry film coating machine, identified as L-2, shall be limited to less than 15 pounds per day. Therefore, pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2 are not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The worst case single HAP delivered to the coating applicators at the ~~three (3)~~ **four (4)** paint booths (K-1, K-2, ~~and K-6~~ **and K-7**) and used at the one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14), and three (3) insignificant oil tanks (J-12, C-9 and C-26) shall be limited to less than 9.9 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit each individual HAP from the entire source to less than 10 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The combination of HAPs delivered to the coating applicators in the ~~three (3)~~ **four (4)** paint booths (K-1, K-2, ~~and K-6~~ **and K-7**) and the total HAPS used at the one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14), and three (3) insignificant oil tanks (J-12, C-9 and C-26), shall be limited to less than 24.7 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit total HAPs from the entire source to less than 25 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Particulate Matter - 10 microns (PM₁₀) [326 IAC 2-8-4]

Any change or modification at the ~~three (3)~~ **four (4)** paint booths (K-1, K-2, ~~and K-6~~ **and K-7**) which increases the solids delivered to the applicators to 2,130 tons per twelve (12) consecutive month period may cause the potential to emit PM₁₀ to increase to 100 tons per year or more, making the requirements of 326 IAC 2-7, Part 70, applicable, based on a fifty percent (50%) transfer efficiency and a control efficiency of ninety-eight percent (98%), and shall require prior IDEM, OAQ, approval. This Condition, in conjunction with the limit of Condition D.2.2, will limit the potential to emit PM₁₀ to less than 100 tons per year from the entire source and make the requirements of 326 IAC 2-7, Part 70, not applicable.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~two (2)~~ **three (3)** paint booths (K-1, ~~and K-2~~ **and K-7**), one (1) centrifuge dip and

spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13) and one (1) portable immersion cold cleaner tank (I-14) and any control devices.

D.1.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) and in order to comply with Condition D.1.5, the particulate from the ~~two (2)~~ **three (3)** spray paint booths, identified as K-1, ~~and K-2~~ **and K-7**, shall be controlled by a dry particulate filter, waterwash, or equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks (Ducts G, ~~and F~~ **and AB**) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks (Ducts G, ~~and F~~ **and AB**) and the presence of overspray on the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily and/or monthly, as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1, the HAP usage limits and HAP emission limits established in Condition D.1.2, and the solids usage requirement in Condition D.1.3.
 - (1) The amount and VOC, HAP and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The total solvent usage, including cleanup solvents, for each month at the entire source;
 - (4) The total VOC usage for each day at **each of the** ~~two (2)~~ **three (3)** paint booths (**K-1, K-2 and K-7**);
 - (5) The total VOC usage for each day at the one (1) centrifuge dip and spin dry film coating machine;
 - (6) The total VOC, HAP and solids usage for each month at the ~~two (2)~~ **four (4)** paint booths (K-1, ~~and K-2~~, **K-6 and K-7**), one (1) centrifuge dip and spin dry film coating

machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14) and three (3) insignificant oil tanks (J-12, C-9 and C-26); and

- (7) The weight of VOCs, HAPs and PM_{10} emitted for each compliance period at the ~~two~~ ~~(2)~~ **four (4)** paint booths (K-1, ~~and~~ K-2, **K-6 and K-7**), one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14) and three (3) insignificant oil tanks (J-12, C-9 and C-26).
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Monthly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facility: Spray paint booth K-7
Parameter: VOC usage
Limit: Less than 15 pounds per day

Months: _____ Year: _____

Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)	Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				No. of deviations			

? No deviation occurred in this month.
? Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facilities: ~~Three (3)~~ **Four (4)** paint booths (K-1, K-2, ~~and K-6~~ **and K-7**), one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14) and three (3) insignificant oil tanks (J-12, C-9 and C-26)
Parameter: VOC delivered to the applicators at the two (2) paint booths plus VOC usage at the other facilities
Limit: Less than 98.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facilities: ~~Three (3)~~ **Four (4)** paint booths (K-1, K-2, ~~and K-6 and K-7~~), one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14) and three (3) insignificant oil tanks (J-12, C-9 and C-26)
Parameter: Worst case single HAP usage (Individual HAP delivered to the applicators at the three (3) paint booths plus individual HAP usage at the other facilities)
Limit: Less than 9.9 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	Worst case single HAP usage (tons)	Worst case single HAP usage (tons)	Worst case single HAP usage (tons)
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facilities: ~~Three (3)~~ **Four (4)** paint booths (K-1, K-2, ~~and K-6~~ **and K-7**), one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14) and three (3) insignificant oil tanks (J-12, C-9 and C-26)
Parameter: Total HAP usage (Combination of HAPs delivered to the applicators at the three (3) paint booths plus total HAPs usage at the other facilities)
Limit: Less than 24.8 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	Total HAP Usage (tons)	Total HAP Usage (tons)	Total HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Effective March 27, 2004, the emission reporting rule, 326 IAC 2-6, will be changed. The rule will no longer be applicable to this source because this source is not a Title V major source, does not emit 5 tons per year or more of lead and does not emit 25 tons per year or more of NO_x in Lake or Porter County. Therefore, Condition C.17 has been removed from the permit as indicated below, and the remainder of Section C has been renumbered accordingly. The Annual Compliance Certification will still be required by April 15th of each year.

~~C.17 — Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]~~

- ~~(a) — The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
400 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(b) — The emission statement required by this permit shall be considered timely if the date post marked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised FESOP, with all revisions and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
CAP/MES

cc: File - St. Joseph County
U.S. EPA, Region V
St. Joseph County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Branch
Administrative and Development
Technical Support and Modeling - Michele Boner



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Imagineering Enterprises, Inc.
1302 West Sample Street
South Bend, Indiana 46619-3894**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 141-14152-00090	
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 18, 2002 Expiration Date: November 18, 2007

First Administrative Amendment 141-16781, issued on November 27, 2002

First Significant Permit Revision 141-17211, issued on April 2, 2003

Second Administrative Amendment 141-18648-00090	Conditions Amended: A.2, Facility Description Box in Section D.1, D.1.1, D.1.2, D.1.3, D.1.6, D.1.7, D.1.10, and D.1.11. Three report forms are revised (current pages 47-49), and one (current page 45) is added
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Date Issued: March 25, 2004

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal automotive and general commercial transportation finishing and coating source.

Authorized Individual:	F. James Hammer
Source Address:	1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address:	1302 West Sample Street, South Bend, Indiana 46619-3895
General Source Phone Number:	(574) 287-2941
SIC Code:	3471/3479
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) paint booths, identified as K-1 and K-2, constructed in 1977 and 1978, respectively, equipped with air atomization spray applicators and dry filters for overspray control, exhausted through Ducts G and F, capacity: 27.0 pounds of coatings per hour, total.
- (b) One (1) centrifuge dip and spin dry film coating machine, also referred to as bulk dip and spin parts coater, identified as L-2, constructed in January 1997 and exhausted through Ducts J and E, capacity: 5 gallons.
- (c) One (1) Passivation Line, also described as Conversion Coating Line #3, exhausting through Stacks B and V, consisting of the following:
 - (1) Seven (7) passivation tanks, identified as C-17 through C-23, capacity: 43 gallons, each;
 - (2) One (1) cold cleaner immersion tank, identified as C-24, constructed prior to February 1993, using Isopropyl Alcohol, capacity: 8 gallons;
 - (3) Two (2) passivation tanks, identified as C-27 and C-28, capacity: 34 gallons, each;
 - (4) One (1) cold cleaner tank, identified as C-29, constructed in 2000, operating in series with C-24, using isopropyl alcohol, capacity: 8 gallons.
- (d) Conversion Coating Line #1, which is a phosphate coating line and a manual etch line,

identified as C-12, C-13, C-14, C-15 and C-16, exhausted through Stack W.

- (e) Conversion Coating Line #2, which is a phosphate coating line, identified as C-2 through C-8 and C-25 exhausted through Ducts T and U.
- (f) Conversion Coating Line #4, which is a phosphate coating line, identified as F-1 through F-9, exhausted through Stack A.
- (g) Plating Line #1, for electroless nickel plating, identified as prep tanks E-1 through E-8, E-21, and F-10, with E-1 exhausted through Stack A, plating tanks E-2 through E-8 exhausted through Stack D, and E-21 and F-10 exhausted through Stacks Z and AA.
- (h) Plating Line #2, for electroless nickel plating, identified as E-9 through E-13, E-15 through E-20, E-22 through E-27, E-30 and E-31, exhausted through Stack C.
- (i) One (1) non-destructive testing area, consisting of eight (8) penetrant tanks, identified as J-1 through J-7 and J-14, one (1) ZL-4C penetrant tank, identified as J-11, and one (1) nitric-hydrofluoric tank, identified as J-13.
- (j) Six (6) portable cold cleaner degreasers, identified as I-3 through I-8, constructed prior to March 1993, using methyl ethyl ketone (MEK), capacity: less than 13 gallons, each.
- (k) One (1) immersion solvent cleaning tank, identified as I-13, constructed in 2001, using methyl ethyl ketone (MEK), capacity: 8 gallons.
- (l) One (1) portable immersion cold cleaner tank, identified as I-14, constructed in 2000, using isopropyl alcohol, capacity: 6 gallons.
- (m) Four (4) blaster booths, two (2) using aluminum oxide, one (1) using glass, vermiculite or an equivalent media, and one (1) using glass, plastic, aluminum oxide or an equivalent media, and one (1) tumble blaster, using aluminum oxide beads, collectively identified as J-9, one (1) of the blaster booths is a wet blaster and the others are equipped with small baghouse dust collectors exhausting into the room; all of the blaster booths are equipped with a common baghouse dust collector exhausted through Vent H, maximum capacity: 400 pounds of parts and 0.7 pounds of blasting media per hour, total.
- (n) One paint booth, identified as K-6, equipped with electrostatic airless guns, including dry filters for overspray control, exhausted thru Duct E.
- (o) One (1) spray paint booth, identified as K-7, equipped with high volume, low pressure (HVLP) spray guns and dry filters for overspray control, exhausting to wall vent AB, capacity: 200 metal parts per day.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - (1) One (1) boiler, identified as B-1, constructed in 1997, fired by natural gas, capacity:

2.07 million British thermal units per hour. [326 IAC 6-2-4]

- (2) One (1) makeup air unit, identified as M-2, constructed in 1997, fired by natural gas, capacity: 4.8 million British thermal units per hour.
 - (3) One (1) water heater, identified as J-10, exhausting through Stack Y, capacity: 0.150 million British thermal units per hour.
 - (4) Two (2) space heaters, identified as N-1 and N-2, capacity: 0.175 million British thermal units per hour, each.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour, including one (1) emergency heating unit operating on liquid propane, identified as I-15, capacity: 0.15 million British thermal units per hour.
 - (c) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. Inorganic baths used for make-ups and temporary storage to facilitate changes and material handling.
 - (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (e) Closed loop heating and cooling systems.
 - (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.
 - (g) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
 - (h) Paved and unpaved roads and parking lots with public access.
 - (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
 - (j) Filter or coalescer media changeout.
 - (k) A laboratory as defined in 326 IAC 2-7-1(21)(D).
 - (l) One (1) electric furnace, identified as K-5, with a capacity of 0.5 cubic feet.
 - (m) One (1) ultrasonic cleaner, identified as I-1.
 - (n) One (1) electric spin dryer, identified as I-12.
 - (o) One (1) oil tank in the parts cleaning area, identified as J-12, used for applying oil to parts, capacity: 68 gallons, using no more than 0.555 pounds of mineral spirits and oil per hour. [326 IAC 2-8-4]
 - (p) Two (2) oil tanks at Conversion Coating Line #2, identified as C-9 and C-26, used for applying

oil to parts, capacity: 5 and 7 gallons, respectively. [326 IAC 2-8-4]

- (q) Four (4) electric ovens, identified as H-1, I-9, I-10 and J-8, and two (2) air friction ovens, identified as I-11 and K-4.

- (r) One (1) automated etch machine, identified as C-30, expected to be operation by January 2003, including one (1) sulfuric acid tank, two (2) rinse/neutralization tanks, and one (1) rust inhibitor tank.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking

and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Imagineering Enterprises, Inc.
South Bend, Indiana
Permit Reviewer: CAP/MES

AA 141-18648
Amended by: MES

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OP No. F 141-14152-00090

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as

defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ / Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section),
or

Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

And

Northern Regional Office: 574-245-4870, facsimile 574-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

-
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the

“authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320

(ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8][326 IAC 2-2]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification that increases the potential to emit PM to 250 tons per year or more shall cause this source to become a major source pursuant to 326 IAC 2-2, PSD, and shall require prior OAQ approval.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

Imagineering Enterprises, Inc.
South Bend, Indiana
Permit Reviewer: CAP/MES

AA 141-18648
Amended by: MES

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- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC

2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

-
- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal"

parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be

submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Coating and cleaning operations

- (a) Two (2) paint booths, identified as K-1 and K-2, constructed in 1977 and 1978, respectively, equipped with air atomization spray applicators and dry filters for overspray control, exhausted through Ducts G and F, capacity: 27.0 pounds of coatings per hour, total.
- (b) One (1) centrifuge dip and spin dry film coating machine, also referred to as bulk dip and spin parts coater, identified as L-2, constructed in January 1997 and exhausted through Ducts J and E, capacity: 5 gallons.
- (c) One (1) Passivation Line, also described as Conversion Coating Line #3, exhausting through Stacks B and V, consisting of the following:
 - (1) Seven (7) passivation tanks, identified as C-17 through C-23, capacity: 43 gallons, each;
 - (2) One (1) cold cleaner immersion tank, identified as C-24, constructed prior to February 1993, using Isopropyl Alcohol, capacity: 8 gallons;
 - (3) Two (2) passivation tanks, identified as C-27 and C-28, capacity: 34 gallons, each;
 - (4) One (1) cold cleaner tank, identified as C-29, constructed in 2000, operating in series with C-24, using isopropyl alcohol, capacity: 8 gallons.
- (d) Conversion Coating Line #1, which is a phosphate coating line and a manual etch line, identified as C-12, C-13, C-14, C-15 and C-16, exhausted through Stack W.
- (e) Conversion Coating Line #2, which is a phosphate coating line, identified as C-2 through C-8 and C-25 exhausted through Ducts T and U.
- (f) Conversion Coating Line #4, which is a phosphate coating line, identified as F-1 through F-9, exhausted through Stack A.
- (g) Plating Line #1, for electroless nickel plating, identified as prep tanks E-1 through E-8, E-21, and F-10, with E-1 exhausted through Stack A, plating tanks E-2 through E-8 exhausted through Stack D, and E-21 and F-10 exhausted through Stacks Z and AA.
- (h) Plating Line #2, for electroless nickel plating, identified as E-9 through E-13, E-15 through E-20, E-22 through E-27, E-30 and E-31, exhausted through Stack C.
- (i) One (1) non-destructive testing area, consisting of eight (8) penetrant tanks, identified as J-1 through J-7 and J-14, one (1) ZL-4C penetrant tank, identified as J-11, and one (1) nitric-hydrofluoric tank, identified as J-13.
- (j) Six (6) portable cold cleaner degreasers, identified as I-3 through I-8, constructed prior to March 1993, using methyl ethyl ketone (MEK), capacity: less than 13 gallons, each.
- (k) One (1) immersion solvent cleaning tank, identified as I-13, constructed in 2001, using methyl ethyl ketone (MEK), capacity: 8 gallons.

- (l) One (1) portable immersion cold cleaner tank, identified as I-14, constructed in 2000, using isopropyl alcohol, capacity: 6 gallons.
- (o) One (1) spray paint booth, identified as K-7, equipped with high volume, low pressure (HVLP) spray guns and dry filters for overspray control, exhausting to wall vent AB, capacity: 200 metal parts per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 8-6-2(a)] [326 IAC 8-1-1] [326 IAC 8-2]

- (a) The amount of VOC delivered to the applicators at the total of the four (4) paint booths (K-1, K-2, K-6 and K-7) and the VOC used at the one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14), and three (3) insignificant oil tanks (J-12, C-9 and C-26) shall be limited to less than 98.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit VOC from the entire source to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply. Compliance with this limit will also satisfy the requirements of 326 IAC 8-6, Organic Solvent Emission Limitations.
- (b) The VOC delivered to the applicators at the three (3) paint booths, identified as K-1, K-2, and K-7, shall be limited to less than 15 pounds per day for each booth. Therefore, pursuant to 326 IAC 8-1-1, the requirements of 326 IAC 8-2 are not applicable.
- (c) The VOC used at the one (1) centrifuge dip and spin dry film coating machine, identified as L-2, shall be limited to less than 15 pounds per day. Therefore, pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2 are not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The worst case single HAP delivered to the coating applicators at the four (4) paint booths (K-1, K-2, K-6 and K-7) and used at the one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14), and three (3) insignificant oil tanks (J-12, C-9 and C-26) shall be limited to less than 9.9 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit each individual HAP from the entire source to less than 10 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The combination of HAPs delivered to the coating applicators in the four (4) paint booths (K-1, K-2, K-6 and K-7) and the total HAPS used at the one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14), and three (3) insignificant oil tanks (J-12, C-9 and C-26), shall be limited to less than 24.7 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit total HAPs from the entire source to less than 25 tons per

year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Particulate Matter - 10 microns (PM₁₀) [326 IAC 2-8-4]

Any change or modification at the four (4) paint booths (K-1, K-2, K-6 and K-7) which increases the solids delivered to the applicators to 2,130 tons per twelve (12) consecutive month period may cause the potential to emit PM₁₀ to increase to 100 tons per year or more, making the requirements of 326 IAC 2-7, Part 70, applicable, based on a fifty percent (50%) transfer efficiency and a control efficiency of ninety-eight percent (98%), and shall require prior IDEM, OAQ, approval. This Condition, in conjunction with the limit of Condition D.2.2, will limit the potential to emit PM₁₀ to less than 100 tons per year from the entire source and make the requirements of 326 IAC 2-7, Part 70, not applicable.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-2][326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), and one (1) portable immersion cold cleaner tank (I-14) without remote solvent reservoirs in St. Joseph County shall:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or

greater.

- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tanks (I-13), and one (1) portable immersion cold cleaner tank (I-14), shall:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (c) The owner or operator of the one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), and one (1) portable immersion cold cleaner tank (I-14) shall also comply with 326 IAC 8-3-2. Compliance with 326 IAC 8-3-5 shall also ensure compliance with 326 IAC 8-3-2.

D.1.5 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from the two (2) paint booths, identified as K-1 and K-2, shall not exceed the pound per hour emission rate established as E in the following formulas:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for three (3) paint booths (K-1, K-2 and K-7), one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13) and one (1) portable immersion cold cleaner tank (I-14) and any control devices.

D.1.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) and in order to comply with Condition D.1.5, the particulate from the three (3) spray paint booths, identified as K-1, K-2 and K-7, shall be controlled by a dry particulate filter, waterwash, or equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAPs usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 VOC Emissions

Compliance with Condition D.1.1 (b) and (c) shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for the day.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks (Ducts G, F and AB) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks (Ducts G, F and AB) and the presence of overspray on the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily and/or monthly, as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1, the HAP usage limits and HAP emission limits established in Condition D.1.2, and the

solids usage requirement in Condition D.1.3.

- (1) The amount and VOC, HAP and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The total solvent usage, including cleanup solvents, for each month at the entire source;
 - (4) The total VOC usage for each day at each of the three (3) paint booths (K-1, K-2 and K-7);
 - (5) The total VOC usage for each day at the one (1) centrifuge dip and spin dry film coating machine;
 - (6) The total VOC, HAP and solids usage for each month at the four (4) paint booths (K-1, K-2, K-6 and K-7), one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14) and three (3) insignificant oil tanks (J-12, C-9 and C-26); and
 - (7) The weight of VOCs, HAPs and PM₁₀ emitted for each compliance period at the four (4) paint booths (K-1, K-2, K-6 and K-7), one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14) and three (3) insignificant oil tanks (J-12, C-9 and C-26).
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Blasting Process

- (m) Four (4) blaster booths, two (2) using aluminum oxide, one (1) using glass, vermiculite or an equivalent media, and one (1) using glass, plastic, aluminum oxide or an equivalent media, and one (1) tumble blaster, using aluminum oxide beads, collectively identified as J-9, one (1) of the blaster booths is a wet blaster and the others are equipped with small baghouse dust collectors exhausting into the room; all of the blaster booths are equipped with a common baghouse dust collector exhausted through Vent H, maximum capacity: 400 pounds of parts and 0.7 pounds of blasting media per hour, total.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies), the particulate emission rate from the four (4) blaster booths and one (1) tumble blaster, collectively identified as J-9 and all exhausting through Vent H, shall not exceed 1.40 pounds per hour, total, when operating at a process weight rate of 400.7 pounds per hour, total.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Particulate Matter - 10 microns (PM₁₀) [326 IAC 2-8-4]

The potential to emit PM₁₀ from the four (4) blaster booths and one (1) tumble blaster, collectively identified as J-9, shall not exceed 16.7 pounds per hour, equivalent to 73.1 tons per year. This limit, in conjunction with Condition D.1.3, will limit the potential to emit PM₁₀ from the entire source to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facilities and their control devices.

Compliance Determination Requirements

D.2.4 Particulate Control (PM and PM₁₀)

In order to comply with Conditions D.2.1 and D.2.2, the baghouse dust collectors for particulate control shall be in operation and control emissions from the four (4) blaster booths and one (1) tumble blaster, collectively identified as J-9, at all times that the any or all of the four (4) blaster booths and one (1) tumble blaster exhausting to that baghouse dust collector is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the blasting stack (Vent H) exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Baghouse Inspections

An inspection shall be performed within the last month of each calendar quarter of all bags controlling the blasting processes when venting to the atmosphere. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Imagineering Enterprises, Inc.
South Bend, Indiana
Permit Reviewer: CAP/MES

AA 141-18648
Amended by: MES

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Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the blasting stack (Vent H) exhaust once per shift.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - (1) One (1) boiler, identified as B-1, constructed in 1997, fired by natural gas, capacity: 2.07 million British thermal units per hour. [326 IAC 6-2-4]
 - (2) One (1) makeup air unit, identified as M-2, constructed in 1997, fired by natural gas, capacity: 4.8 million British thermal units per hour.
 - (3) One (1) water heater, identified as J-10, exhausting through Stack Y, capacity: 0.150 million British thermal units per hour.
 - (4) Two (2) space heaters, identified as N-1 and N-2, capacity: 0.175 million British thermal units per hour, each.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour, including one (1) emergency heating unit operating on liquid propane, identified as I-15, capacity: 0.15 million British thermal units per hour.
- (c) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. Inorganic baths used for make-ups and temporary storage to facilitate changes and material handling.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (e) Closed loop heating and cooling systems.
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.
- (g) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) Filter or coalescer media changeout.
- (k) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (l) One (1) electric furnace, identified as K-5, with a capacity of 0.5 cubic feet.
- (m) One (1) ultrasonic cleaner, identified as I-1.
- (n) One (1) electric spin dryer, identified as I-12.

- (o) One (1) oil tank in the parts cleaning area, identified as J-12, used for applying oil to parts, capacity: 68 gallons, using no more than 0.555 pounds of mineral spirits and oil per hour. [326 IAC 2-8-4]
- (p) Two (2) oil tanks at Conversion Coating Line #2, identified as C-9 and C-26, used for applying oil to parts, capacity: 5 and 7 gallons, respectively. [326 IAC 2-8-4]
- (q) Four (4) electric ovens, identified as H-1, I-9, I-10 and J-8, and two (2) air friction ovens, identified as I-11 and K-4.
- (r) One (1) automated etch machine, identified as C-30, expected to be operation by January 2003, including one (1) sulfuric acid tank, two (2) rinse/neutralization tanks, and one (1) rust inhibitor tank.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the 2.07 million British thermal units per hour heat input boiler shall be limited to 0.6 pounds per million British thermal unit heat input.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification that increases the potential VOC emissions from the three (3) insignificant oil tanks (J-12, C-9 and C-26) to 25 tons per year or more may make the facilities subject to the requirements of 326 IAC 8-1-6, New facilities; General reduction requirements, and shall require prior IDEM, OAQ, approval.

D.3.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

The three (3) insignificant oil tanks (J-12, C-9 and C-26) shall comply with Conditions D.1.1 and D.1.2, which limit the VOC and HAP usage at the three (3) insignificant oil tanks (J-12, C-9 and C-26), along with the amount of VOC and HAPs delivered to the applicators at the total of the two (2) paint booths (K-1 and K-2) and the VOC and HAPs used at the one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13) and one (1) portable immersion cold cleaner tank (I-14).

Compliance Determination Requirements

D.3.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

The three (3) insignificant oil tanks (J-12, C-9 and C-26) shall comply with Conditions D.1.7 and D.1.8, which specify compliance determination requirements for the three (3) insignificant oil tanks (J-12, C-9 and C-26).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no applicable compliance monitoring conditions for these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.5 Record Keeping Requirement

The three (3) insignificant oil tanks (J-12, C-9 and C-26) shall comply with Condition D.1.11, which specifies record keeping requirements for the three (3) insignificant oil tanks (J-12, C-9 and C-26).

D.3.6 Reporting Requirements

The three (3) insignificant oil tanks (J-12, C-9 and C-26) shall comply with Condition D.1.12, which specifies reporting requirements for the three (3) insignificant oil tanks (J-12, C-9 and C-26).

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10): Coating operations

- (n) One paint booth, identified as K-6, equipped with electrostatic airless guns, including dry filters for overspray control, exhausted thru Duct E.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) For the topcoat operation, the VOC delivered to a coating applicator that applies extreme performance coatings shall be limited to 3.5 pounds of VOC per gallon of coating excluding water.
- (b) For the primer operation, the VOC delivered to a coating applicator shall be limited to 3.0 pounds of VOC per gallon of coating, excluding water.
- (c) Pursuant to 326 IAC 8-1-1(b), the requirements of 8-2 (listed here as D.4.1(a) and D.4.1(b)) are not applicable on days that the VOC delivered to the applicator is limited to less than 15 pounds per day.

D.4.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from the one paint booth, K-6, shall not exceed the pound per hour emission rate established as E in the following formulas:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour, and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour, and} \\ P = \text{process weight rate in tons per hour.}$$

D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one paint booth, K-6.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.4.4 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stack (Duct E). The Compliance Response Plan shall

be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack (Duct E) and the presence of overspray on the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspection and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-16]

D.4.5 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1 and 2) below. Records maintained for (1) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits.
 - (1) The VOC content of each coating material and the solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (2) For coatings used for D.4.1(c), the VOC content of each coating material and the solvents used. These records shall be kept on a daily basis.
- (b) To document compliance with Condition D.4.4, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

D.4.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1(c) shall be submitted to the address listed in Section C - General Reporting Requirements of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

? Annual Compliance Certification Letter

? Test Result (specify) _____

? Report (specify) _____

? Notification (specify) _____

? Affidavit (specify) _____

? Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information
in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090

This form consists of 2 pages

Page 1 of 2

? This is an emergency as defined in 326 IAC 2-7-1(12)
?The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
?The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

Imagineering Enterprises, Inc.
South Bend, Indiana
Permit Reviewer: CAP/MES

AA 141-18648
Amended by: MES

Page 52 of 64
OP No. F 141-14152-00090

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Monthly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facility: Paint booth K-1
Parameter: VOC usage
Limit: Less than 15 pounds per day

Months: _____ Year: _____

Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)	Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				No. of deviations			

? No deviation occurred in this month.
? Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Monthly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facility: Paint booth K-2
Parameter: VOC usage
Limit: Less than 15 pounds per day

Months: _____ Year: _____

Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)	Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				No. of deviations			

? No deviation occurred in this month.

? Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Monthly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facility: Paint booth K-6
Parameter: VOC usage
Limit: Less than 15 pounds per day

Months: _____ Year: _____

Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)	Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				No. of deviations			

? No deviation occurred in this month.

? Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Monthly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facility: Spray paint booth K-7
Parameter: VOC usage
Limit: Less than 15 pounds per day

Months: _____ Year: _____

Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)	Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				No. of deviations			

? No deviation occurred in this month.
? Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Monthly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facility: One (1) centrifuge dip and spin dry film coating machine, identified as L-2
Parameter: VOC usage
Limit: Less than 15 pounds per day

Months: _____ Year: _____

Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)	Day	Month 1 VOC usage (lbs)	Month 2 VOC usage (lbs)	Month 3 VOC usage (lbs)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				No. of deviations			

? No deviation occurred in this month.

? Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facilities: Four (4) paint booths (K-1, K-2, K-6 and K-7), one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14) and three (3) insignificant oil tanks (J-12, C-9 and C-26)
Parameter: VOC delivered to the applicators at the two (2) paint booths plus VOC usage at the other facilities
Limit: Less than 98.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this quarter.
? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facilities: Four (4) paint booths (K-1, K-2, K-6 and K-7), one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14) and three (3) insignificant oil tanks (J-12, C-9 and C-26)
Parameter: Worst case single HAP usage (Individual HAP delivered to the applicators at the three (3) paint booths plus individual HAP usage at the other facilities)
Limit: Less than 9.9 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	Worst case single HAP usage (tons)	Worst case single HAP usage (tons)	Worst case single HAP usage (tons)
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this quarter.
? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090
Facilities: Four (4) paint booths (K-1, K-2, K-6 and K-7), one (1) centrifuge dip and spin dry film coating machine (L-2), one (1) cold cleaner immersion tank (C-24), six (6) portable cold cleaner degreasers (I-3 through I-8), one (1) cold cleaner tank (C-29), one (1) immersion solvent cleaning tank (I-13), one (1) portable immersion cold cleaner tank (I-14) and three (3) insignificant oil tanks (J-12, C-9 and C-26)
Parameter: Total HAP usage (Combination of HAPs delivered to the applicators at the three (3) paint booths plus total HAPs usage at the other facilities)
Limit: Less than 24.8 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	Total HAP Usage (tons)	Total HAP Usage (tons)	Total HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Imagineering Enterprises, Inc.
Source Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
Mailing Address: 1302 West Sample Street, South Bend, Indiana 46619-3895
FESOP No.: F 141-14152-00090

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:
Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Imagineering Finishing Technologies
Address City IN Zip: 1302 W. Sample Street
Permit Number: 141-18648
Pit ID: 141-00090
Permit Reviewer: CarrieAnn Paukowits
Application Date: March 10, 2004

Flexible Concepts Paint Booth (K-7)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Primer	12.9	21.40%	0.0%	21.4%	0.0%	60.30%	0.01071	8.333	2.76	2.76	0.25	5.91	1.08	1.19	4.58	70%
Primer Solvent	6.49	99.86%	0.0%	99.9%	0.0%	0.00%	0.00311	8.333	6.48	6.48	0.17	4.03	0.74	0.00	N/A	70%
Topcoat	9.62	43.46%	0.0%	43.5%	0.0%	36.97%	0.01036	8.333	4.18	4.18	0.36	8.66	1.58	0.62	11.31	70%
Topcoat Solvent (Xylene)	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.00259	8.333	7.25	7.25	0.16	3.76	0.69	0.00	N/A	70%

PM Control Efficiency:

70.00%

State Potential Emissions

Add worst case coating to all solvents

Uncontrolled

0.932

22.4

4.08

1.81

Controlled

0.932

22.4

4.08

0.542

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Page 2 of 2 Amendment App A

Company Name: Imagineering Finishing Technologies
Address City IN Zip: 1302 W. Sample Street
Permit Number: 141-18648
Plt ID: 141-00090
Permit Reviewer: CarrieAnn Paukowits
Application Date: March 10, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Benzene	Weight % Toluene	Weight % MIBK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)
Primer	12.9	0.01071	8.333	5.00%	0.00%	0.00%	35.00%	0.25	0.00	0.00	1.76
Primer Solvent	6.49	0.00311	8.333	0.00%	0.00%	10.00%	0.00%	0.00	0.00	0.07	0.00
Topcoat	9.62	0.01036	8.333	47.00%	5.00%	0.00%	0.00%	1.71	0.18	0.00	0.00
Topcoat Solvent (Xylene)	7.25	0.00259	8.333	100.00%	0.00%	0.00%	0.00%	0.69	0.00	0.00	0.00

Total State Potential Emissions	2.65	0.182	0.074	1.76
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METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs